

Dear City of Vancouver,

The Interstate Bridge Replacement Program is excited to be nearing the release of the Draft Supplemental Environmental Impact Statement (SEIS). This will afford the public the opportunity to review and comment on the analysis of potential impacts and mitigations of the Modified Locally Preferred Alternative (LPA).

The city's resolution adopting the Modified LPA in July 2022 reflected the hard work of regional elected officials, as well as local jurisdictional leadership. Not everyone got exactly what they wanted in the Modified LPA, but all got what is needed: a path forward to a new bridge that will keep our region connected for a century to come. Between the eight jurisdictions endorsing the Modified LPA we received 175 conditions in total. In addition to your endorsement, the city attached 33 conditions. We provided a response to 26 of your conditions in prior correspondence. We have been coordinating with others in the region to address your six remaining conditions related to greenhouse gas (GHG)/vehicle miles traveled (VMT) and design issues.

Attachment A outlines how the program is addressing your remaining conditions.

We will continue to work with City of Vancouver staff, as the program progresses, to ensure the implementation of the commitments made by the program in response to your conditions.

Thank you for participation in the Modified LPA endorsement and conditions process. I'd like to also thank you for your ongoing commitment to this regional effort to replace the bridge and keep the economy of the region strong.

Sincerely,

Greg Johnson
IBR Program Administrator

ATTACHMENT A

Agency Name	#	Condition	Response
City of Vancouver	2	In collaboration with Program partners define a GHG reduction goal that is Program-specific and supports state, regional, and local GHG reduction goals, including the City's goal of carbon neutrality by 2040.	The Modified LPA included a commitment by the IBR program to establish a GHG reduction target relative to regional transportation impact, and to develop and evaluate design solutions that contribute to achieving program and state-wide climate goals. The NEPA impact analysis shows the reduction in GHG and VMT from the program in the Portland Metro Region compared to the No Build in 2045; the project is accelerating progress to state, regional, and local goals.
City of Vancouver	3	The GHG analysis committed to by the IBR program shall include data related to changes in travel behavior (modal splits and induced demand), modeled vehicle miles traveled at years 2030, 2040, and 2050, and assumptions regarding tolling consistent with Oregon and Washington State Departments of Transportation toll programs.	The NEPA analysis presents estimates of the modal split, VMT, and GHG associated with the program compared to the No Build Alternative in 2045. The IBR program worked with Metro, project partners, and the USDOT to establish methods for the analysis, which are consistent with other regional planning efforts. The analysis presented in the NEPA document uses 2019 as the base year and 2045 as the build year. The NEPA Draft Supplemental EIS presents estimates of annual GHG resulting from traffic in the region in 2019 and 2045. These evaluations are consistent with current state and regional plans for tolling and predict reductions in GHG compared to No Build. These reductions will be facilitated by the development of high-capacity transit, improved bicycle and pedestrian facilities, and the implementation of tolls on the I-5 bridge. The Draft SEIS reviews the potential for increased demand resulting from program improvements and found

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			<p>the build alternatives would reduce vehicle miles traveled compared to No Build. The potential for increased vehicle miles traveled created by the IBR improvements is limited by:</p> <ul style="list-style-type: none"> • The high level of land use controls in both Washington and Oregon. • System constraints to the north and south of the IBR improvement area, which limit the ability of auxiliary lanes to act as a major capacity improvement, particularly at a regional level. • The demand for the Modified LPA being served more efficiently than No-Build, with more person-trips but fewer daily vehicles due to the combination of high-capacity transit, tolls, active transportation, and operational and design improvements. <p>Other means to constrain automobile travel demand include enhanced local efforts to improve access to transportation options such as TOD, decreasing distance between job centers and residential areas, and continued coordination of transit service to improve ridership within the Portland-Vancouver metropolitan area.</p>
City of Vancouver	4	Collaborate with Partners to define mitigation strategies for urban heat island effects and air pollutants associated with the infrastructure and vehicular traffic of the Program.	<p>The NEPA document presents requirements and mitigation to minimize air quality impacts. These measures will be documented in contract specifications.</p> <p>The program will consider mitigation strategies for urban heat island effects in continued collaboration with the program partners. These may include design measures currently in</p>

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			<p>development for the program related to design for active transportation system and transit stations and additional measures associated with environmental permitting and approvals.</p>
City of Vancouver	5	<p>Prepare and present a plan that shows how Program-related GHG will be monitored and reported during and after construction, and how it will be mitigated plus funding options for mitigations. There shall be regular updates on progress, including annual reporting on the status of the GHG target and mitigation efforts to offset emissions.</p>	<p>The NEPA analysis includes an estimate of the GHG production during the construction period. The Draft EIS presents a high-level estimate developed using a FHWA tool for this purpose. With updated design information developed as the program progresses, the IBR program will refine these estimates. The IBR program will document requirements, aligned with climate goals, in contract specifications. The IBR program will work with partners to explore plans and strategies for benchmarking construction efforts. Continued monitoring and progress toward state, regional, and local GHG goals will require on-going coordination and cooperation with multiple agencies. The IBR program will continue to work with these partners to develop tools, strategies, and policies to contribute to achieving state, regional, and local goals.</p>
City of Vancouver	9	<p>Further analysis is needed to determine design of a bridge that meets the defined Program Purpose and Need.</p>	<p>The Modified LPA currently includes one auxiliary lane in each direction on the bridge that will be analyzed to see if it meets 2045 measures of effectiveness. The program will assess freight operational functionality through the Environmental Phase to ensure freight needs are addressed. Results from these studies will be available through publication of the Draft SEIS.</p>

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City of Vancouver	15	Ensure that design of the transit guideway allows for access and use by buses and emergency vehicles in addition to light rail transit.	The program will continue to work with partners and the community on transit design including the light rail alignment, station locations and design, and potential Park and Ride facilities. In conjunction with the partners, the program will be analyzing transit elements to meet ridership demand and goals. The program is analyzing the tradeoffs of adding embedded track and exploring other options that could meet the same needs.
City of Vancouver	22	Demand management strategies shall be developed with the goals to manage auto demand and congestion during peak traffic periods, support downtown Vancouver's circulation goals, reduce greenhouse gas emissions, and must include the use of variable rate tolling.	The IBR program includes demand management strategies including variable rate tolling and the provision of multi-modal options including high-capacity transit.